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July 17, 2024

**VIA ELECTRONIC FILING**

The Honorable Stephanos Bibas  
18614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: *TexasLDPC Inc. v. Broadcom Inc. et al.*, C.A. No. 1:18-cv-01966-SB

Dear Judge Bibas:

TexasLDPC submits this short letter to address, at a high level, the misleading statements contained in Broadcom's July 16, 2024 letter. First, counsel for Broadcom's statements about communications from TexasLDPC's counsel are hyperbolic and misleading. TexasLDPC counsel advised Dr. Murthy of the following "I would again recommend that you consult with your own lawyer to ensure that your interests are taken into consideration and that you do not inadvertently place yourself in jeopardy." D.I. 627, Ex. D. The fact that Broadcom's counsel would use creative quoting to mislead and pervert the meaning of a communication recommending retention of counsel is telling.

With regard to the remainder of the three pages, this is all a flight of fancy with no basis in reality. TexasLDPC asked for a brief delay in the collection in India because it wanted its expert to be present for the collection. The Indian Court's order was not clear and TexasLDPC's expert was not in attendance that day. The Court "fined" TexasLDPC less than \$250 just to account for the time Broadcom's expert lost in travelling to Court that day. Nor does TexasLDPC have anything to do with any investigations being performed on Dr. Murthy by the IEEE in India. TexasLDPC's counsel had no idea that the IEEE would communicate with Dr. Murthy in any capacity, and it was TexasLDPC's counsel alone (with absolutely no involvement of TexasLDPC principals or Dr. Gunnam) that made the decision to request the slight delay so its Indian expert could attend the collection.

Regardless if the Court permits Broadcom to pursue its conspiracy theories about happenings in India, TexasLDPC requests that the Court issue a partial judgment and certify its claims for appeal.

**FISH.**

Honorable Stephan Bibas  
July 17, 2024

Respectfully submitted,

*/s/ Warren K. Mabey, Jr.*

Warren K. Mabey, Jr.